



SPECIALIST PROSECUTOR'S OFFICE
ZYRA E PROKURORIT TË SPECIALIZUAR
SPECIJALIZOVANO TUŽILAŠTVO

In: KSC-BC-2020-06
Specialist Prosecutor v. Hashim Thaçi, Kadri Veseli, Rexhep Selimi and Jakup Krasniqi

Before: Pre-Trial Judge
Judge Nicolas Guillou

Registrar: Dr Fidelma Donlon

Filing Participant: Specialist Prosecutor

Date: 18 November 2020

Language: English

Classification: Public

Public redacted version of 'Request for extension of the word limit', filing KSC-BC-2020-06/F00003 dated 22 May 2020

Specialist Prosecutor
Jack Smith

Counsel for Hashim Thaçi
David Hooper

Counsel for Kadri Veseli
Ben Emmerson

Counsel for Rexhep Selimi
David Young

Counsel for Jakup Krasniqi
Venkateswari Alagenda

1. On 25 April 2020, the Specialist Prosecutor's Office ('SPO') requested that the Pre-Trial Judge confirm an indictment against Hashim THAÇI, Kadri VESELI, Rexhep SELIMI, and Jakup KRASNIQI ('Suspects').¹ At that time, the SPO also foreshadowed filing a future request concerning arrest warrants and associated relief ('Request').²
2. Pursuant to Article 36(1) of the Practice Direction,³ the SPO requests that the Pre-Trial Judge authorise a limit of 9,000 words for the Request.⁴ In the present, exceptional circumstances, good cause exists for this extension in light of the complex factual and legal circumstances involved by the Request and the accompanying need for the SPO to make meaningful submissions in full conformity with the relevant provisions of the Law⁵ and Rules.⁶ In this regard, the SPO intends to make submissions on and request multiple reliefs relating to the arrest and transfer of the four Suspects, search and seizure, [REDACTED], and non-disclosure of the Indictment and related material.
3. This filing is filed strictly confidential and *ex parte* in accordance with Rules 85(4) and 86(2).

Word count: 267



Jack Smith

Specialist Prosecutor

Wednesday, 18 November 2020
At The Hague, the Netherlands.

¹ Submission of Indictment for confirmation, KSC-BC-2020-06/F00002, 25 April 2020, Strictly Confidential and *Ex Parte* (with three annexes).

² KSC-BC-2020-06/F00002, para.5.

³ Registry Practice Direction, Files and Filings before the Kosovo Specialist Chambers, KSC-BD-15, 17 May 2019 ('Practice Direction').

⁴ The standard word limit for motions is 6,000 words. *See* Article 41 of the Practice Direction.

⁵ Law No.05/L-053 on Specialist Chambers and Specialist Prosecutor's Office, 3 August 2015 ('Law').

⁶ Rules of Procedure and Evidence Before the Kosovo Specialist Chambers, KSC-BD-03/Rev2/2020, 5 July 2017 ('Rules'). Unless otherwise indicated, all references to 'Rule(s)' are to the Rules.